

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 22-cv-61467-Moore

JOHN RHONE,

Plaintiff,

v.

A.T.A. MEAT COMPANY, INC.,  
LOUI JABR,

Defendants.

**AFFIDAVIT OF ELLIOT KOZOLCHYK**

BEFORE ME, the undersigned authority personally appeared Elliot Kozolchyk, who upon being first duly sworn, deposes and states as follows:

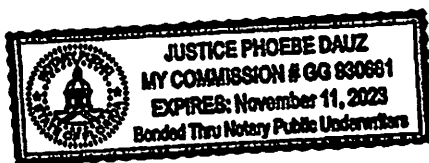
1. My name is **ELLIOT KOZOLCHYK**; I am over eighteen years of age; I reside in the United States and I have personal knowledge of the matters set forth herein. I understand the English language and completely and fully understand the contents of this Affidavit.
2. I am the plaintiff's counsel in the case of *Rhone v. A.T.A. Meat Company, Inc. et al*, Case No. 22-cv-61467-KMM in the United States District Court, Southern District of Florida..
3. I have reviewed the billing statement attached hereto as **Exhibit 1** and it is authentic and accurate.


All of the representations herein are true and correct to the best of my ability and knowledge.

  
ELLIOT KOZOLCHYK

STATE OF FLORIDA                     )  
   ) SS  
COUNTY OF BROWARD             )

The foregoing instrument was sworn to and subscribed before me, on this 1st day of November, 2022, by **ELLIOT KOZOLCHYK**, who is personally known to me.



  
NOTARY PUBLIC, State of Florida

**EXHIBIT B**

**Exhibit 1****Billing Statement  
Elliot Kozolchyk**

Date	T	Description	Fees
5/25/22	2	Met and interviewed Client	\$ 800.00
7/2/22	1.4	Researched Defendants' location and business, including their gross annual revenue.	\$ 560.00
8/6/22	0.4	Prepared Complaint against all Defendants	\$ 160.00
8/6/22	0.3	Prepared Exhibit A to the Complaint, the Statement of Claim	\$ 120.00
8/8/22	0.1	Reviewed DE 2, Judge Assignment, and DE 3, Summonses	\$ 40.00
8/8/22	0.1	Reviewed DE 4, Notice of Court Practices, and DE 5, Order Referring Case	\$ 40.00
8/18/22	0.2	Prepared DE 6, Notice of Filing Statement of Claim	\$ 80.00
8/30/22	0.1	Reviewed email from OC announcing appearance and asking for settlement offer	\$ 40.00
8/30/22	0.7	Discussed case with client and settlement.	\$ 280.00
8/30/22	0.7	Composed email to OC with Plaintiff's Settlement offer and non-monetary terms and sent to OC	\$ 280.00
8/31/22	0.1	Reviewed DE 7, Notice of Appearance	\$ 40.00
8/31/22	0.9	Researched Defendants' counsel, Defendants' firm, and their experience.	\$ 360.00
8/31/22	0.5	Sent email to OC sending orders as required by Court and conferring on mediator and mediation dates	\$ 200.00
9/2/22	0.5	Reviewed Client's documents and discussed same with Client.	\$ 200.00
9/2/22	1.3	Began drafting interrogatories and requests for production.	\$ 520.00
9/7/22	0.1	Reviewed email from OC with settlement counteroffer	\$ 40.00
9/8/22	0.7	Phone call with Client to review Defendant's settlement offer and to discuss case	\$ 280.00
9/9/22	0.1	Reviewed email from OC conferring on Waiver of Service and conferring on motion for deadline extension	\$ 40.00
9/9/22	0.4	Sent reply email to OC agreeing to motion for extension and declining Defendant's Settlement offer	\$ 160.00
9/12/22	0.2	Reviewed email from OC accepting Plaintiff's first settlement offer	\$ 80.00
9/12/22	0.2	Exchanged emails to OC regarding filing Notice of Settlement	\$ 80.00
9/12/22	0.7	Phone call with Client regarding Settlement Offer acceptance, answered questions and discussed case.	\$ 280.00
9/12/22	0.2	Prepared DE 8, Notice of Settlement	\$ 80.00
9/14/22	0.1	Reviewed DE 9, Notice of Court Practices upon Settlement	\$ 40.00
9/14/22	0.2	Reviewed DE 10, Order Vacating DE 9 and Notice of Court Practices upon Settlement	\$ 80.00
9/20/22	0.7	Discussed case and settlement terms with Client.	\$ 280.00
9/20/22	0.6	Drafted Settlement Agreement	\$ 240.00
9/20/22	0.3	Emailed Defendants' counsel discussing Settlement Agreement	\$ 120.00
10/4/22	0.2	Emailed Defendants' counsel regarding Settlement Agreement	\$ 80.00
10/18/22	0.2	Emailed Defendants' counsel regarding Settlement Agreement	\$ 80.00
11/1/22	0.8	Reviewed Defendants' counsel's revisions to Settlement Agreement. Discussed same with client. Emailed Defendants' counsel regarding revisions.	\$ 320.00
11/1/22	0.9	Coordinated with Client regarding finalized Settlement Agreement, discussed case with Client.	\$ 360.00
11/1/22	0.5	Prepared Motion to Approve Settlement.	\$ 200.00
11/1/22	0.2	Reviewed billing records.	\$ 80.00

**Exhibit 1****Billing Statement  
Elliot Kozolchyk**

Date	Type	Description	Cost
8/6/22	Filing Fee	Complaint	\$ 402.00
8/20/22	Service of Process	JABR, LOUI	\$ 69.00
4/13/22	Service of Process	A.T.A. MEAT COMPANY, INC.	\$ 44.00

Time	16.6
Hourly Rate \$	400.00
Fees \$	6,640.00
Costs \$	515.00
Total \$	7,155.00